

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Case No. 12-16353
	)	
DUANNE M. COUSINS	)	Chapter 7
	)	
Debtor.	)	Judge: Pat E. Morgenstern-Clarren

**MOTION OF TRUSTEE FOR TURNOVER OF FUNDS**

Richard A. Baumgart, Trustee herein, respectfully moves this Court for an Order directing the Debtor to turnover to the bankruptcy estate the sum of \$5,682.49 representing the non-exempt portion of a bonus from his employer, and in support thereof states as follows:

1. This bankruptcy case was commenced by the filing of a Voluntary Petition for Relief under Chapter 7 on August 30, 2012 (the "Petition Date").
2. At the time of the commencement of this bankruptcy case, the Debtor, Duanne M. Cousins, was expecting a bonus from his employer.
3. The Debtor received the bonus on December 14, 2012, in the net amount of \$10,741.43.
4. The prorated amount of the bonus due and payable to the bankruptcy estate was \$7,131.24.
5. The Debtor is entitled to or has claimed exemptions in the amount of \$1,448.75, which makes the total non-exempt portion due and payable to the bankruptcy estate \$5,682.49.
6. To date, the Debtor has not remitted that amount to the estate.

WHEREFORE, your Trustee prays for an Order directing the Debtor to turnover the sum of \$5,682.49 to the bankruptcy estate.

/s/ Patrick A. Hruby  
Patrick A. Hruby (#0085107)  
DETTELBACH, SICHERMAN & BAUMGART  
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Cleveland, OH 44114-3169  
Phone: 216-696-6000 Fax: 216-696-3338  
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**Attorney for the Trustee**

**CERTIFICATE OF SERVICE**

I certify that on April 3, 2013, a true and correct copy of the foregoing Motion for Turnover was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Steve Emery, on behalf of the Debtor, at [semery@ohiolegalclinic.com](mailto:semery@ohiolegalclinic.com)  
United States Trustee, at [\(registered address@doj.gov\)](mailto:(registered address@doj.gov))

And by regular U. S. Mail, postage prepaid on:

Duanne M. Cousins  
12402 Oakfield Avenue  
Cleveland, OH 44105

/s/ Patrick A. Hruby  
Patrick A. Hruby (#0085107)  
DETTELBACH, SICHERMAN & BAUMGART  
1801 East Ninth Street, Suite 1100  
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